

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	CASE NO. 21-30725
BRAZOS ELECTRIC POWER	§	
COOPERATIVE, INC.,	§	Chapter 11
	§	
Debtor. ¹	§	

**CERTIFICATE OF NO OBJECTION REGARDING DEBTOR’S MOTION FOR ENTRY
OF AN ORDER (I) FURTHER EXTENDING THE TIME WITHIN WHICH THE
DEBTOR MAY REMOVE ACTIONS AND (II) GRANTING RELATED RELIEF**

[Relates to Dkt. No. 1498]

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel certifies as follows:

1. On January 27, 2022, Brazos Electric Power Cooperative, Inc. (the “Debtor”) filed its *Motion for Entry of an Order (I) Further Extending the Time Within Which the Debtor May Remove Actions and (II) Granting Related Relief* (the “Motion”) [Dkt. No. 1498].
2. The deadline for parties to object or file responses to the Motion was February 17, 2022. No objections have been filed and there no outstanding informal responses to the Motion.
3. Wherefore, the Debtor respectfully requests that the Court approve the Motion and enter the Proposed Order.

¹ The Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is: Brazos Electric Power Cooperative, Inc. (4729). Additional information regarding this case may be obtained on the website of the Debtor’s claims and noticing agent at <http://cases.stretto.com/Brazos>. The Debtor’s address is 7616 Bagby Avenue, Waco, TX 76712.

Dated: February 22 2022
Houston, Texas

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

By: /s/ Jason L. Boland

Jason L. Boland (SBT 24040542)

Julie G. Harrison (SBT 24092434)

Maria Mokrzycka (SBT 24119994)

1301 McKinney Street, Suite 5100

Houston, TX 77010

Telephone: (713) 651-5151

Facsimile: (713) 651-5246

Email: jason.boland@nortonrosefulbright.com

Email: julie.harrison@nortonrosefulbright.com

Email: maria.mokrzycka@nortonrosefulbright.com

Steve A. Peirce (SBT 15731200)

111 West Houston Street, Suite 1800

San Antonio, TX 78205

Telephone: (210) 270-7179

Facsimile: (210) 270-7205

Email: michael.parker@nortonrosefulbright.com

Email: steve.peirce@nortonrosefulbright.com

*Counsel for the Debtor
and Debtor in Possession*

-and -

O'MELVENY & MYERS LLP

Louis R. Strubeck, Jr. (SBT 19425600)

2501 North Harwood Street

Dallas, Texas 75201

Email: lstrubeck@omm.com

Telephone: (972) 360-1925

*Co-Counsel for the Debtor and Debtor in
Possession*

Certificate of Service

I certify that on February 22, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Maria Mokrzycka

Maria Mokrzycka